



VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

March 7, 2014

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

Re: Cumby Telephone Cooperative, Inc. Expression of Interest for Connect America Phase II
Rural Broadband Experiment
WC Docket No. 10-90 – Connect America Fund

Dear Ms. Dortch:

Cumby Telephone Cooperative, Inc. (Cumby) hereby submits this non-binding expression of interest to conduct a Connect America Phase II rural broadband experiment. Cumby is both a rate-of-return regulated incumbent local exchange carrier (ILEC) and a competitive local exchange carrier (CLEC) in east Texas. This expression of interest is for Cumby's CLEC operation that offers superior communications services in neighboring price cap territories. A separate expression of interest is being filed for Cumby's rate-of-return ILEC territory.

Background

Cumby was founded in 1967, and is wholly owned by its subscriber members. Cumby offers high-quality voice, Internet, and video services. Wireline-based broadband services are currently available in all of our ILEC and CLEC exchanges, although small pockets of unserved and underserved customers remain due to their remoteness. In most cases, the download broadband speeds offered are 2 Mbps, 4 Mbps, 6 Mbps, and 10 Mbps. Cumby offers high-quality voice, broadband, and video services to all businesses and anchor institutions. In Cumby's CLEC exchanges – Brashear, Cooper, Lone Oak, Shirley, and Miller Grove – we hold market shares ranging from 60 to nearly 100 percent, which reflects both the superior service provided by Cumby, as well as the lack of interest by the incumbents in serving these rural areas. CenturyLink is the ILEC in Cooper, while Verizon is the incumbent in the remaining exchanges. Cumby is currently an eligible telecommunications carrier (ETC) in all of its CLEC exchanges.



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*InTouch by CumbyTel • PO Box 619 • 201 Frisco • Cumby, TX 75433
PH: 903.994.2211 • Toll Free: 888.994.4604 • Fax: 903.994.2200*

Proposal

While Cumby is offering broadband to the large majority of the customers in its CLEC exchanges, there remain small pockets of customers to which it (or any other provider) is not offering broadband at speeds of at least 3 Mbps downstream / 768 kbps upstream. Cumby is committed to bringing high-quality broadband to these customers. However, to do so in a timely manner will require universal service support. What follows are proposals for rural broadband experiments for each of our CLEC exchanges.

Lone Oak exchange, Hunt county, Census Tract 48231960700

There are approximately 141 customers in the Lone Oak exchange without access to broadband at speeds of at least 3 Mbps downstream / 768 kbps upstream. Approximately 20 percent of these customers have no broadband service available whatsoever. Fiber has already been deployed in the network, but three remotes are still needed to make quality broadband service available. Cumby expects to request one-time support of approximately \$169,000 for this investment in the formal proposal stage.

Upon receipt of the Connect America Fund (CAF) support, Cumby expects to be able to make improved broadband offerings available within three to six months. Cumby plans to offer these customers download speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to existing broadband customers. It also plans to offer video service. Cumby is currently offering wireline voice service to these customers and would continue to do so.

Brashear exchange, Hopkins County, Census Tract 48223950200

There are approximately 147 customers in the Brashear exchange without access to broadband at speeds of at least 3 Mbps downstream / 768 kbps upstream. Approximately 35 percent of these customers have no broadband service available whatsoever. Fiber has already been deployed in the network, but four remotes are still needed to make quality broadband service available. Cumby expects to request one-time support of approximately \$227,000 for this investment in the formal proposal stage.

Upon receipt of the CAF support, Cumby expects to be able to make improved broadband offerings available within three to six months. Cumby plans to offer these customers broadband speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to its existing broadband customers. It also plans to offer video service. Cumby is currently offering wireline voice service to these customers and would continue to do so.

Miller Grove exchange, Hopkins County, Census Tract 48223950200

There are approximately 33 customers in the Miller Grove exchange without access to broadband at speeds of at least 3 Mbps downstream / 768 kbps upstream. Approximately 20 percent of these customers have no broadband service available whatsoever. Fiber has already

been deployed in the network, but one remote is still needed to make quality broadband service available. Cumby expects to request one-time support of approximately \$98,000 for this investment in the formal proposal stage.

Upon receipt of the CAF support, Cumby expects to be able to make improved broadband offerings available within three to six months. Cumby plans to offer these customers broadband speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to its existing broadband customers. It also plans to offer video service. Cumby is currently offering wireline voice service to these customers and would continue to do so.

Shirley exchange, Hopkins County, Census Tracts 48223950800, 48223950300, 48223950200

There are approximately 300 customers in the Shirley exchange without access to any broadband service whatsoever. Cumby would like to do a fiber-to-the-home (FTTH) build to these customers. Cumby expects to request one-time support of approximately \$646,000 for this investment in the formal proposal stage.

Upon receipt of the CAF support, Cumby expects to be able to make broadband offerings available within six to twelve months. Cumby plans to offer these customers broadband speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to its existing broadband customers. It also plans to offer wireline voice and video service.


Cooper exchange, Delta County, Census Tract 48119950100

There are 300 customers in the Cooper exchange without access to any broadband service whatsoever. Cumby would like to do a FTTH build to these customers which would necessitate 125 route miles of fiber. Cumby expects to request one-time support of approximately \$4 million for this investment in the formal proposal stage.

Upon receipt of the CAF support, Cumby expects to be able to make broadband offerings available within six to twelve months. Cumby plans to offer these customers broadband speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to its existing broadband customers. It also plans to offer wireline voice and video service.

Thank you for your consideration. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karen Zimmerman', with a large, sweeping flourish extending to the right.

Karen Zimmerman

General Manager
Cumby Telephone Cooperative, Inc.